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1 | MORTON & CRAIG LLC | William E. Craig, Esq.

110 Marter Ave.

Suite 301

| Moorestown, NJ 08057 | Telephone: 856-866-0100

Attorney for: ACAR Leasing LTD

d/b/a GM Financial Leasing

JM-5630\_

In re:

EUGENE FINNEGAN

SHARON FINNEGAN

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UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Case No. 23-11113(CMG)

Chapter 13

Hearing date:

OBJECTION TO CONFIRMATION

ACAR Leasing LTD d/b/a GM Financial Leasing objects to the Debtor's Chapter 13 Plan for the following reasons:

a. The Debtors fail to assume the Lease for the

2023 Chevrolet Equinox. The Plan must call for the
assumption of the Lease. Presently, the lease is
rejected in the Plan. If the Lease is not assumed, at
confirmation, the stay will lift automatically in
accordance with §365(p)(3). Pre-petition arrears, if
any, must be cured through the Plan within 6 months of
filing as an administrative priority expense, and the
Plan should so provide. Post-petition payments must be

Case 23-11113-CMG Doc 21 Filed 03/24/23 Entered 03/24/23 10:17:47 Desc Main Document Page 2 of 2 paid directly to GM Financial Leasing in accordance with the terms of the Lease. /s/ William E. Craig William E. Craig, attorney for ACAR Leasing LTD d/b/a GM Financial Leasing Dated: 3/24/23